



July 3, 2012

VIA ECF

The Honorable Tonianne J. Bongiovanni, U.S.M.J.
U.S. District Court for the District of New Jersey
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street
Trenton, New Jersey 08608

Re: AstraZeneca AB, et al. v. Hanmi USA, Inc. et al.
Civ. Action No. 11-0760 (JAP)(TJB)

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Dear Magistrate Judge Bongiovanni:

We, along with Fitzpatrick, Cella, Harper & Scinto and Covington & Burling LLP represent the Plaintiffs in this action. As discussed during yesterday's telephone conference with Your Honor, we write on behalf of all parties requesting the Court to order the following schedule:

Event	Proposed Schedule
Parties' Disclosure of Reliance on Advice of Counsel (L.Pat.R. 3.8)	10/15/2012
Close of Fact Discovery	11/20/2012
Opening Expert Reports	12/7/2012
Responsive Expert Reports	1/11/2013
Rebuttal Expert Reports	2/1/2013
Expert Depositions Commence	2/4/2013
Expert Depositions End	3/4/2013
Rule 26(a)(3) Disclosures	Subject to the Court's preferences
Rule 26(a)(3) Objections	Subject to the Court's preferences
Deadline for Pretrial Motions	Subject to the Court's preferences
Response to Pretrial Motions	Subject to the Court's preferences
Pretrial Conference/Pretrial Motions Hearing	Subject to the Court's preferences
Trial	April 2013 (Dates to be determined)

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All parties in this action agree to this schedule and it also reflects the same dates proposed in *AstraZeneca et al. v. Mylan et al.*, Civil Action No. 12-01378 through the end of expert discovery (March 4, 2013).

If the proposed dates are agreeable to the Court, the parties request that Your Honor so order this letter and have it entered on the docket.

Respectfully submitted,

s/John E. Flaherty

John E. Flaherty

cc (via ECF):

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SO ORDERED this ____ day of July 2012

Tonianne J. Bongiovanni, U.S.M.J.